EXHIBIT 2

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

THEFACEBOOK, INC.,	)	
Plaintiff,	)	
vs.	)	NO. 1 05 CV 047381
CONNECTU LLC,	)	
Defendant.	)	

CONFIDENTIAL

VIDEOTAPED DEPOSITION UPON ORAL EXAMINATION

OF

JOHN TAVES

8:58 a.m. - 4:49 p.m.

January 29, 2007

719 Second Avenue, Suite Number 900

Seattle, Washington

Joan E. Kinn, CCR, RPR

Court Reporter

A. No. 09:37:56
Q. Okay. Have you ever seen this list of topics 09:37:57
in Exhibit A? 09:38:00
A. I think so. 09:38:03
Q. Okay. Number 2 says, work performed for 09:38:04
ConnectU; do you see that? 09:38:08
A. Yeah. 09:38:10
Q. Are you prepared today to talk about work 09:38:10
that you performed for ConnectU? 09:38:13
A. Yeah. 09:38:15
Q. Okay. So you started in December 2004, 09:38:16
correct? 09:38:21
A. Yeah. 09:38:21
Q. Okay. What were you working on at the time? 09:38:22
MR. MOSKO: Question is vague. 09:38:26
A. You mean what did we work on for ConnectU? 09:38:28
Q. Mm-hm. 09:38:32
A. I'm not sure. 09:38:33
Q. Okay. So the whole time you worked, the 09:38:35
whole time you worked for ConnectU, why don't you just 09:38:38
give me a list of things you worked on, maybe that will 09:38:41
be easier to do it that way. 09:38:45
A. I'm not sure what we have worked on for them, 09:38:46
I don't know. 09:38:50
Q. You're supposed to be the person most 09:38:50

A. Yeah, go ahead. 10:04:42
Q. What is this? 10:04:44
A. I think this was i2Hub and ConnectU's thoughts on how to share their, you know, two services and contribute marketing. 10:04:48 10:04:54 10:05:00
Q. Okay. And did you review this at the time you received it? 10:05:03 10:05:05
A. I think so, yeah. 10:05:05
Q. Do you recall if you asked Cameron any questions about it? 10:05:07 10:05:12
A. I don't remember, but I probably would have. 10:05:12
Q. Okay. Would anybody else have talked to Cameron about this document? 10:05:14 10:05:17
MR. MOSKO: On behalf of Pacific Northwest Software? 10:05:19 10:05:20
A. Winston and Joel. 10:05:22
Q. Winston and Joel? 10:05:24
A. Winston and Joel. 10:05:25
Q. Okay. And why Winston? 10:05:27
A. Well, I don't remember specifically the timing of all these things, but Winston was working on ConnectU. Whether he was working on ConnectU at exactly this time, I don't know, but I'm just assuming that it would have been Winston. 10:05:36 10:05:38 10:05:43 10:05:47 10:05:49
Q. But this is -- 10:05:51

A. He was the primary developer for ConnectU. 10:05:51
Q. Okay, sorry to interrupt you. 10:05:54
Okay, and so this might have been a project he would have worked on for ConnectU while working at Pacific Northwest? 10:05:56 10:05:57 10:06:02
A. Right. 10:06:02
Q. Okay, great. If you look at the second page. 10:06:03
A. Mm-hm. 10:06:07
Q. It has a section called CU Modifications more technical. 10:06:08 10:06:12
A. Mm-hm. 10:06:13
Q. Is that, to your recollection, is that just modifications to the existing site that ConnectU wanted Pacific Northwest to do; do you know? 10:06:14 10:06:23 10:06:27
MR. MOSKO: Calls for speculation. 10:06:31
A. So say that question again, because this -- 10:06:40
Q. Okay, so let's start at the beginning then, maybe this will make it more clear, Mr. Taves. 10:06:43 10:06:45
A. Okay. 10:06:48
Q. I don't want to confuse you. 10:06:48
A. Okay. 10:06:49
Q. So this is an overview, it looks like an integration spec that Cameron sent to you. 10:06:50 10:06:53
A. Mm-hm. 10:06:55
Q. And this looks like it outlines the project 10:06:56

the client talks to? 10:13:07
MR. MOSKO: Calls for speculation and lacks foundation. 10:13:09 10:13:11
A. We pass it around quite a bit. 10:13:11
Q. Okay, so there's not -- there's not sort of like a team lead and then -- 10:13:14 10:13:16
A. No. 10:13:17
Q. Okay. And what is your role then with the company? 10:13:18 10:13:21
MR. MOSKO: Generally or in this instance? 10:13:21
Q. Do you understand the question? 10:13:23
A. Well, I'm the -- I'm the CEO, the president, but, you know, Mike and I are fairly equal, and so we team up to make the major decisions. 10:13:24 10:13:34 10:13:40
Q. Okay, it's a fairly small company, right? 10:13:42
A. Yes. 10:13:45
Q. So as the CEO, what are your day-to-day responsibilities? 10:13:46 10:13:50
A. Anything I feel like doing. I mean I worry about the books, I worry about who we employ, I worry about the customers, I worry about the -- 10:13:50 10:13:55 10:13:58
Q. Okay, do you do any development work yourself? 10:14:01 10:14:03
A. Yeah, some. 10:14:04
Q. And did you do any development work for 10:14:05

ConnectU? 10:14:07
A. No. 10:14:08
Q. Who did that? 10:14:09
A. The bulk of it was Winston. 10:14:10
Q. Okay. 10:14:12
A. Joel did some. I think there was others that did a little bit, but I can't remember the extent of all of them. 10:14:13 10:14:16 10:14:20
Q. Okay. Did Wayne Chang do any? 10:14:20
A. I don't think so. 10:14:23
Q. Okay. 10:14:25
A. Could be wrong. 10:14:26
Q. Did you have any interaction with iMarc, a company called iMarc, with regard to your work -- 10:14:36 10:14:51
A. Yeah. 10:14:53
Q. -- with ConnectU? 10:14:53
MR. MOSKO: Let her finish the question before answering. 10:14:54 10:14:56
Q. So you did, okay. Who at iMarc did you work with or talk to? 10:14:57 10:15:00
A. I can't remember his name. 10:15:02
Q. Mark Pierrat? 10:15:05
A. That sounds familiar. There might have been another name too. 10:15:08 10:15:11
Q. Dave Tufts? 10:15:13

Q. Okay. How would you describe your management style in terms of the people who work for you? 10:45:16 10:45:22

MR. MOSKO: The question is vague, overbroad, and uncertain. 10:45:24 10:45:27

A. You would have to be more specific, I, you know. 10:45:29 10:45:32

Q. Are you a micro manager, do you watch what they do? 10:45:33 10:45:36

A. I don't think I'm a micro manager. 10:45:37

Q. Do you have regular status meetings? 10:45:40

A. No, not regular. 10:45:44

Q. Would you have meetings to talk with your team working on a particular product or project to see how it's going? 10:45:45 10:45:58 10:45:58

MR. MOSKO: Calls for speculation and lacks foundation. 10:45:58 10:45:59

A. Yeah, we do have meetings. 10:46:00

Q. Do you expect regular updates from your developers on how projects are going? 10:46:02 10:46:05

MR. MOSKO: Vague and uncertain. 10:46:07

A. I don't expect, I hope. 10:46:09

Q. Do you get regular updates from your developers? 10:46:11 10:46:14

A. No, not regular. I get updates. 10:46:15

Q. You get updates. If something significant is 10:46:18

happening in a project, do you generally learn about it? 10:46:23
A. Well, the ones I haven't learned about I 10:46:28
don't know, so. 10:46:30
Q. Would you expect your developers to tell you 10:46:31
significant things that are going on in their projects? 10:46:34
A. I would hope so. 10:46:36
Q. Okay. 10:46:38
A. But I don't expect it. 10:46:38
Q. And if and when you have status meetings with 10:46:40
your staff, what kinds of things do you talk about? 10:46:43
MR. MOSKO: The question is hopelessly vague 10:46:46
and overbroad and uncertain. 10:46:48
A. We talk about all sorts of things. 10:46:52
Q. Okay. So let's take ConnectU for example, 10:46:56
did you have any staff meetings regarding ConnectU's 10:46:59
projects? 10:47:03
MR. MOSKO: Vague as to time. 10:47:03
A. I'm sure we have had meetings. 10:47:05
Q. Do you recall any of them? 10:47:07
A. No. I mean the definition of meeting, you 10:47:15
know, we exchange E-mails, we do chats, there's nothing 10:47:21
any -- there's nothing formal about it. Communication 10:47:26
happened all over the place, so it's just, yeah, I mean 10:47:30
you got the E-mails. 10:47:39
Q. But you're generally kept up to date on 10:47:42

Q. Okay. 11:10:04
What did you mean when you said, we've got nothing interesting, go bark up another tree? 11:10:06 11:10:09
A. Well, with Winston gone, I didn't think we had any information for you. Winston is the answers as far as I'm concerned. 11:10:12 11:10:16 11:10:19
Q. Why Winston? 11:10:20
A. He did the majority of the work for ConnectU. 11:10:22
Q. But ConnectU hired Pacific Northwest Software to do the work, correct? 11:10:26 11:10:29
A. Mm-hm. 11:10:30
Q. Do you have any sense for how many documents you produced? 11:10:34 11:10:37
A. No. 11:10:39
Q. Okay. When you say we've got nothing interesting, what do you mean by that? 11:10:40 11:10:45
A. Your -- I don't think I can contribute any information as to anything about the Social Butterfly or Facebook importer or whatever it is, because Winston was the major developer for ConnectU, and he's not an employee, so, you know, I don't have the information. 11:10:56 11:11:01 11:11:05 11:11:11 11:11:17
Q. Okay. So the other tree you wanted us to bark up is Winston? 11:11:28 11:11:28
A. I don't care where you bark, I was just getting tired of paying lawyers to answer these 11:11:28 11:11:30

Q. Do you know what he's talking about? 11:46:46
MR. MOSKO: Calls for speculation, the document speaks for itself. 11:46:49 11:46:51
A. Not really, no. 11:46:55
Q. Okay. He says, the bulk of our time was spent on it; do you see that? 11:46:58 11:47:01
A. Mm-hm. 11:47:03
Q. If the bulk of Winston's time was spent on a project, would you not be aware of it? 11:47:05 11:47:09
MR. MOSKO: Calls for speculation and lacks foundation and assumes facts not in evidence. 11:47:12 11:47:14
A. Okay, on this sentence I'm not sure who he's referring to as our. And then specifically on your question, you said if Winston worked on something, would I not know about it, could you say that again? 11:47:28 11:47:28 11:47:32 11:47:37
Q. I think I will actually. 11:47:40
A. Okay. 11:47:41
Q. I'm trying to figure out who manages these projects, because if Wayne -- if Winston spent a great deal of time on this product, it seems to me because your company is small that you would know what Winston is doing. I'm doing the same thing you did. Were you not aware of the projects he was working on? 11:47:42 11:47:46 11:47:51 11:47:55 11:47:59 11:48:02
MR. MOSKO: Let me object to the question as lacking in foundation and overbroad and substantially 11:48:05 11:48:07

misstating the document and misinterpreting the 11:48:11
document. 11:48:17
A. You're correct, I was not aware of the 11:48:17
details of what Winston is working on. I knew that he 11:48:20
was working on ConnectU and that they were paying the 11:48:24
bills. 11:48:27
Q. And that's all you were concerned about? 11:48:28
A. Pretty much. 11:48:30
Q. So do you know what Wayne is referring to 11:48:44
that -- go back to the first page, if you will, please. 11:48:48
A. Mm-hm. 11:48:50
Q. The sentence where he says that Social 11:48:51
Butterfly now illegally uses logins and passwords 11:48:54
procured from ConnectU users, do you know what he's 11:48:58
talking about there? 11:49:01
MR. MOSKO: Objection, question calls for 11:49:02
speculation, lacks foundation, and is substantially 11:49:05
incomprehensible. 11:49:09
A. I don't know the details. 11:49:19
Q. Why was Wayne sending you bullet, I'm 11:49:29
assuming he means bullet points, but why was he sending 11:49:33
you this, do you know, did you ask him for it? 11:49:37
MR. MOSKO: Compound, answer the latter 11:49:42
question I think is the one she's asking for. 11:49:45
A. Why did he send it? 11:49:47

Q. No, did you ask him for it? 11:49:49
A. No, I didn't ask him to send me this. I -- I don't know. 11:49:51 11:49:53
Q. Did you have a discussion with him that preceded this E-mail about these issues? 11:49:53 11:49:56
MR. MOSKO: Overbroad. 11:50:00
A. Could be. 11:50:01
Q. Would you have asked him to put in an E-mail the bullet points? 11:50:04 11:50:08
MR. MOSKO: Calls for speculation, lacks foundation. 11:50:10 11:50:12
A. It seems unlikely. It seems more like he was seeking out my help than I was encouraging him to seek it out. 11:50:13 11:50:17 11:50:21
Q. Did you talk to anyone at ConnectU about these issues? 11:50:21 11:50:24
MR. MOSKO: Lacks foundation. 11:50:25
Q. You, Mr. Taves. 11:50:26
MR. MOSKO: Hold on one second. 11:50:28
The question lacks foundation and is overbroad. 11:50:30 11:50:32
A. If these issues are Wayne's relationship with Cameron, yes, I did, you know, E-mail and speak with Cameron and Wayne about it. 11:50:35 11:50:39 11:50:46
Q. What did you E-mail Cameron about? 11:50:51